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March 7, 2019

By ECF

Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Trahan v. Lazar et al., 19-cv-01131 (GHW)

Dear Judge Woods:

This firm represents all defendants in the above-referenced action, namely Nancy Lazar, Andrew Laperriere, Roberto Perli, Michael Kantrowitz, George Zachar, Cornerstone Macro Holdings LLC, and Cornerstone Macro Research LP F/K/A Cornerstone Macro LP (the “Defendants”).

I am writing to request that Your Honor enter the Stipulation and Order filed simultaneously herewith, to set the following schedule: (i) Defendants are to file their opposition to Plaintiff’s Motion for a Preliminary Injunction (the “Motion”) on or before March 18, 2019, (ii) Plaintiff is to file his Reply papers to said motion on or before March 29, 2019; and (iii) the date by which Defendants must move, answer or otherwise respond to the Complaint be extended from March 29, 2019 to April 29, 2019. The response date to answer the Complaint was initially extended to March 29, 2019 by the Court with the parties’ consent but that date was set before Plaintiff filed the present Preliminary Injunction motion. We believe the intervening Preliminary Injunction motion justifies this second extension. Counsel for Plaintiff Francois Trahan, Akiva Shapiro of Gibson, Dunn and Crutcher LLP, consents to the foregoing schedule.

Additionally Defendants request that the Court grant their request to file a memorandum of law in opposition to the Preliminary Injunction motion not to exceed 35 pages. Defendants believe that a brief of that length will aid the court and is justified given the complexity of the issues presented.

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Plaintiff's counsel takes no position on Defendants' request for ten (10) additional pages except to say that if such relief were granted they would request an additional five (5) pages for Plaintiff's reply. Your Honor has the authority to enter the Stipulation and Order pursuant to F.R.C.P. 6(b)(1)(A).

Respectfully submitted,



Anthony L. Paccione

cc: Counsel for Plaintiff via ECF